

LABATON SUCHAROW LLP
Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, New York 10005

*Lead Counsel to Securities Lead Plaintiff and
the Class*

MICHELSON LAW GROUP
Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068

*Special Bankruptcy Counsel to Securities
Lead Plaintiff and the Class*

(additional counsel on Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Reorganized Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

SECURITIES PLAINTIFFS' PRE-HEARING STATEMENT

Date: December 19, 2023
Time: 10:00 a.m. (PT)
Before: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, California 94102

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

Proposed Lead Plaintiff Public Employees Retirement Association of New Mexico (“PERA”) hereby submits this pre-hearing statement for the December 19, 2023 hearing before the Court, where the Court will set the briefing schedule for Reorganized Debtors’ objection to PERA’s proofs of claim [Dkt. No. 14200].

PERA agrees with Baupost [*see* Dkt. No. 14225] that the Court should grant Securities Claimants¹ at least 90 days to respond to Reorganized Debtors' objections—*i.e.*, until March 12, 2024—in light of the length and scope of those objections, the documents submitted in support of those objections (consisting of approximately 4,500 pages), and the need for discovery. However, the actual response deadline date will depend upon whether the parties can coordinate and complete discovery within such 90-day timeframe. PERA proposes that the parties should continue to meet and confer and propose a joint schedule for discovery.

Separately, the Ninth Circuit Court of Appeals has not yet issued a decision regarding the stay order in the related proceedings in the District Court styled *In re PG&E Corp. Secs. Litig.*, No. 3:18-cv-03509-EJD (N.D. Cal.). Accordingly, PERA does not presently intend to move under 28 U.S.C. § 157(d) to withdraw the reference from this Court with respect to the objections/sufficiency motions. However, PERA reserves all of its rights concerning a potential motion to withdraw the reference once the Ninth Circuit Court of Appeals issues its decision.

Dated: December 18, 2023

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Thomas A. Dubbs
Thomas A. Dubbs (*pro hac vice*)
*Lead Counsel to Securities Lead
Plaintiff and the Class*

- and -

MICHELSON LAW GROUP

¹ For the avoidance of doubt, any response deadline established by the Court should also be applicable to the Securities Act Plaintiffs that have filed Securities Claims.

1
2 By: /s/ Randy Michelson
3 Randy Michelson (SBN 114095)
4 Local Bankruptcy Counsel to Securities Lead
5 Plaintiff and the Class

6 - and -
7

8
9 **LOWENSTEIN SANDLER LLP**
10 Special Bankruptcy Counsel to Securities Lead
11 Plaintiff and the Class

12 - and -
13

14 **WAGSTAFFE, VON LOEWENFELDT, BUSCH**
15 & RADWICK, LLP
16 *Liaison Counsel for the Class*

17 - and -
18

19 **ROBBINS GELLER RUDMAN & DOWD LLP**
20 *Counsel for the Securities Act Plaintiffs*

21 - and -
22

23 **VANOVERBEKE, MICHAUD & TIMMONY,**
24 P.C.
25 *Additional Counsel for the Securities Act Plaintiffs*

EXHIBIT A

COUNSEL

LABATON SUCHAROW LLP

Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, New York 10005
Telephone 212-907-0700
tdubbs@labaton.com
cvillegas@labaton.com
mcanty@labaton.com
thoffman@labaton.com

*Lead Counsel to Securities Lead Plaintiff and
the Class*

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone 973-597-2500
Facsimile 973-597-2333
metkin@lowenstein.com
abehlmann@lowenstein.com
scargill@lowenstein.com
crestel@lowenstein.com

*Special Bankruptcy Counsel to Securities
Lead Plaintiff and the Class*

ROBBINS GELLER RUDMAN & DOWD LLP

Darren J. Robbins (SBN 168593)
Brian E. Cochran (SBN 286202)
655 West Broadway, Suite 1900
San Diego, California 92101
Telephone 619-231-1058
darrenr@rgrdlaw.com
bcochran@rgrdlaw.com

VANOVERBEKE, MICHAUD & TIMMONY, P.C.

HIMMONT, P.C.
Thomas C. Michaud
79 Alfred Street
Detroit, Michigan 48201
Telephone 313-578-1200

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK, LLP**

James M. Wagstaffe (SBN 95535)
Frank Busch (SBN 258288)
100 Pine Street, Suite 725
San Francisco, California 94111
Telephone 415-357-8900
wagstaffe@wvbrlaw.com
busch@wvbrlaw.com

Liaison Counsel for the Class

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
Telephone 415-512-8600
Facsimile 415-512-8601
randy.michelson@michelsohnlawgroup.com

Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class

ROBBINS GELLER RUDMAN & DOWD LLP

Willow E. Radcliffe (SBN 200089)
Kenneth J. Black (SBN 291871)
Hadiya K. Deshmukh (SBN 328118)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone 415-288-4545
willowr@rgrdlaw.com
kennyb@rgrdlaw.com
hdeshmukh@rgrdlaw.com

tmichaud@vmtlaw.com

Counsel for the Securities Act Plaintiffs